



April 6, 2016

Reference No. 038443-12

Ms. Leslie Patterson
Remedial Project Manager
United States Environmental Protection Agency
Region V
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Chicago, Illinois
60604

Mr. Steve Renninger
On-Scene Coordinator
U.S. EPA Region V
Emergency Response Branch
26 West Martin Luther King Drive
Cincinnati, Ohio
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Dear Ms. Patterson and Mr. Renninger:

**Re: Progress Report: March 1 through 31, 2016
South Dayton Dump and Landfill Site, Moraine, Ohio (Site)**

This Monthly Progress Report is submitted in accordance with the Administrative Settlement and Order on Consent (ASAO) for Remedial Investigation/Feasibility Study (RI/FS) Proceeding Under Sections 104, 107, and 122 of the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), as amended, 42 U.S.C. §§ 9604, 9607, and 9622 (United States Environmental Protection Agency [USEPA]) Docket No. V-W-06-C-852) effective August 15, 2006 (RI/FS ASAO), and the ASAO for Removal Action Proceeding Under Sections 104, 106(a), 107, and 122 of the CERCLA, 42 U.S.C. §§ 9604, 9606(a), 9607, and 9622 USEPA Docket No. V-W-13-C-010, effective April 8, 2013 (Removal Action ASAO), for the period of March 1 through 31, 2016.

The next Progress Report for the month of April 2016 will be submitted on or before May10, 2016.

Significant Developments in this Reporting Period

RI/FS ASAO Developments

A conference call was held on March 4, 2016 to discuss the draft SOW. The participants included USEPA, the Respondents, and GHD. Proposed modifications to the ASAO and SOW were subsequently transmitted to USEPA via e-mail on March 15, and USEPA responded with additional SOW modifications on the same day. The updated versions of the ASAO and SOW are being reviewed by the Respondents.

Removal Action ASAO Developments

On March 18, 2016, GHD provided USEPA with a comparison of prior- and post-SSDS modification vacuum readings at Building 8 (B&G Equipment & Truck Repair), Building 9 (B&G Equipment & Truck Repair) and Building 24 (Globe Food Equipment), as requested during the February 25, 2016

conference call. On March 21, 2016, GHD and USEPA discussed the vacuum readings during a telephone call. USEPA stated that sampling 60-days after the SSDS modifications should be completed in Buildings 8 and 9. USEPA and GHD agreed that should the sampling results be favorable, that sampling event would count as the annual proficiency sampling event for 2016, and no additional sample collection would be required from those buildings in July.

On March 24, 2016, USEPA and the Respondents participated in a conference call regarding the status of the SSDS modifications.

During the March 24 conference call, the participants discussed the following topics:

- GHD collected annual proficiency samples from Building 17 (Megacity of Cincinnati LLC) and Building 24 (Globe Food Equipment) in February 2016.
- Building 17 sample results were less than the ODH screening levels (Attenuation Factor [AF] = 10).
 - In accordance with the Work Plan, only indoor air samples were collected in Building 17 because the sub-slab probe vacuum readings were acceptable.
- The Building 24 sub-slab sample result for location SS-24-B was greater than the ODH screening level (AF=10) but was less than the secondary screening level (AF=33), and is therefore in compliance.
- SSDS modifications at Building 12 (Overstreet Painting and S&J Precision), Building 14 (NexGen Vending, formerly Bullseye Amusements), and Building 15 (SIM Trainer) are scheduled to begin on April 4, 2016.
- Following the modifications, GHD will send a summary of vacuum readings (i.e., measured prior to and following SSDS modifications).
- Sampling for Building 12 (Overstreet Painting and S&J Precision), Building 14 (NexGen Vending), and Building 15 (SIM Trainer) was proposed for 60 days following the SSDS modifications (i.e., June). USEPA consented to one single mobilization in July 2016. Therefore, GHD will complete the SSDS modification sampling and annual proficiency sampling in one joint event in July 2016.
- SSDS confirmatory sampling will be conducted at Buildings 8 and 9 (B&G Equipment & Truck Repair) in April, to satisfy the requirement to collect samples 60 days after SSDS modifications. If sample results are favorable, USEPA will also consider this April sampling event as the annual proficiency sampling event for 2016, and the next sample event would occur in July 2017.
- Next conference call scheduled for April 22, 2016 at 2:30 PM ET.

The status as of March 31, 2016, for each building requiring mitigation is summarized in Attachment A.

Summaries of all Anticipated Problems and Planned Resolutions

As previously discussed with USEPA, a number of the owners and tenants in buildings planned for vapor mitigation have expressed concerns regarding the intrusion that the VI sampling and mitigation

has had, and will have, on their business. The owners of the buildings (i.e., South Dayton Remediation Trust) refused to allow additional work to occur. On October 24, 2014, the Respondents transmitted letters to the owners and tenants of the buildings with remaining sub-slab issues providing the analytical results for sampling completed to date and seeking their consent to cease intrusive vapor abatement activities and transition to an enhanced indoor air monitoring program. In January 2015, the legal counsel for the owners provided written notification that the owners and tenants agree to allow indoor air monitoring to proceed but were not willing to allow further remedial work. In September 2015, USEPA and GHD met with owners and tenants and informally discussed the potential for further remedial work. In December 2015 and January 2016 meetings were conducted with owner/tenants at all building locations with a SSDS to address further remedial work. Owners/tenants agree to allow further remedial work (i.e., mitigation system modifications).

Projected Work for the Next Reporting Period

- The Respondents and USEPA On-Scene Coordinator will continue to work together to discuss VI mitigation measures and implement the mitigation work plan.
- Coordinate with owners/tenants to schedule and complete SSDS modifications at Building 12 (Overstreet Painting and S&J Precision), Building 14 (NexGen Vending, formerly Bullseye Amusements), and Building 15 (SIM Trainer).

Should you have any questions on the above, please do not hesitate to contact us.

Sincerely,

GHD



Julian Hayward

BR/cb/35

Encl.

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| cc: (all by pdf) | Leslie Patterson, U.S. EPA | Madelyn Adams, Ohio EPA |
| | Wendell Barner, Barner Consulting | Steve Quigley, GHD |
| | Tim Hoffman, Dinsmore & Shohl | Brett Fishwild, CH2M Hill |
| | Robin Lunn, Neal, Gerber & Eisenberg | Ken Brown, ITW |
| | Bryan Heath, NCR | Jim Campbell, EMI |
| | Scott Blackhurst, Kelsey Hayes Company | Wray Blattner, Thompson Hine |
| | Lauren Foster, Tetra-Tech | Valerie Chan, GHD |
| | Brandon Helm, Tetra-Tech | |

Summary of Building Status

As of March 31, 2016, the status of each building requiring mitigation was as follows:

Building 8 (B&G Trucking):

- 30-day proficiency sampling completed on September 12, 2013, with additional confirmatory sampling completed on January 9, 2014 and March 10, 2014.
- 2015 indoor air (IA) and/or SS soil vapor sampling were completed on February 17, 2015, July 15, 2015, and October 6, 2015:
 - Trichloroethene concentration in SS soil vapor samples collected from probes SS-8-A and SS-8-B were greater than ODH screening level (AF of 33). GHD suspects a localized TCE source under the building may be contributing to elevated TCE concentrations in the SS soil vapor.
 - Benzene concentrations from IA locations IA-8-A and IA-8-D were less than ODH screening levels. Benzene concentration from IA location IA-8-F was greater than the ODH screening level in the July 2015 sampling round. Available evidence suggests IA benzene concentrations are the result of ongoing daily human activities within and around Building 8 as well as IA background sources, and are not the result of a complete VI pathway.
 - The fan at extraction point EP-3 was not operating during the majority of the July 2015 sampling round and was replaced late in the day on July 15, 2015.
 - The fans at extraction points EP-1 and EP-2 were not operating on September 29, 2015 and were replaced on October 1, 2015.
 - All fans were operational during the October 2015 sampling round.
- SSDS modifications including EP-3 and EP-5 stemline installations were completed on February 5, 2016.
- 60-day post-SSDS modification sampling will be conducted at Building 8 (B&G Equipment & Truck Repair) in April 2016.¹

Building 9 (B&G Trucking):

- 30-day and 180-day proficiency sampling completed on October 24, 2013 and March 10, 2014, respectively, with additional 180-day confirmatory sampling completed on May 20, 2014.
- Two rounds of 2015 IA and SS soil vapor sampling completed on February 17, 2015, and July 15, 2015:
 - TCE concentrations in samples collected from SS soil vapor probe SS-9-A remain greater than ODH screening levels. GHD suspects a localized TCE source under the building may be contributing to elevated TCE concentrations in SS soil vapor.
 - Benzene and xylenes were not detected in Building 9 during the July 2015 sampling round.
- SSDS modifications including EP-2 stemline installation and EP-3 installation were completed on February 5, 2016.

¹ If sample results are favorable, USEPA will also consider this April sampling event as the annual proficiency sampling event for 2016, and the next sample event would occur in July 2017

- 60-day post-SSDS modification sampling will be conducted at Building 9 (B&G Equipment & Truck Repair) in April 2016.¹

Building 12 (Overstreet Painting and S&J Precision):

- 30-day proficiency sampling completed on October 24, 2013. A corrective action was implemented on March 6, 2014 and additional confirmatory sampling was completed on April 2 and 3, 2014.
- Two rounds of 2015 IA and SS soil vapor sampling completed on February 18, 2015 and July 13, 2015:
 - TCE concentrations in SS soil vapor samples remain greater than ODH screening and action levels. GHD suspects a localized TCE source under the building may be contributing to elevated TCE concentrations in SS soil vapor.
 - cis-1,2-Dichloroethene (cis-1,2-DCE) concentrations in SS soil vapor samples have decreased to less than the ODH screening level.
 - Benzene remains present in IA samples at concentrations greater than ODH screening levels; however, based on available data, the benzene concentrations in indoor air are a result of ongoing daily human activities within and around Building 12, and are not the result of a complete VI pathway.
- Respondents and USEPA proposed SSDS modifications to the building owner and tenants during the January 28, 2016 meeting.
- SSDS modifications at Building 12 (Overstreet Painting and S&J Precision) are scheduled to begin on April 4, 2016.
- 60-day post-SSDS modification sampling and annual proficiency sampling will be completed in one joint event in July 2016.

Building 14 (NexGen Vending):

- 30-day proficiency sampling completed on January 16, 2014 and 180-day proficiency sampling completed on June 3, 2014.
- Two rounds of 2015 IA and SS soil vapor sampling completed on February 19, 2015 and July 16, 2015.
- The building is in compliance; IA and SS concentrations are less than ODH screening levels.
- A proposed SSDS modification (addition of an extraction point) was agreed upon during the January 28, 2016 meeting.
- SSDS modifications at Building 14 (NexGen Vending) are scheduled to begin on April 4, 2016.
- 60-day post-SSDS modification sampling and annual proficiency sampling will be completed in one joint event in July 2016.

Building 15 (SIM Trainer):

- 30-day proficiency sampling completed on February 13, 2014. A corrective action was implemented on April 6, 2014 and additional confirmatory sampling was completed on April 24, 2014.
- Two rounds of 2015 IA and SS soil vapor sampling completed on February 18, 2015 and July 14, 2015.

- July 2015 TCE SS concentration at SS-15-C was greater than the ODH SS screening level (AF of 33).
- IA concentrations are less than ODH IA screening levels.
- Respondents and USEPA proposed SSDS modifications to the building owner during the January 28, 2016 meeting.
- SSDS modifications at Building 15 (SIM Trainer) are scheduled to begin on April 4, 2016.
- 60-day post-SSDS modification sampling and annual proficiency sampling will be completed in one joint event in July 2016.

Building 17 (Megacity Construction):

- 30-day and 180-day proficiency sampling completed on January 16, 2014, and June 3, 2014, respectively.
- 1-year proficiency sampling completed on February 19, 2015.
- Annual proficiency sampling was completed on February 10, 2016.
- The building is in compliance.

Building 24 (Globe Equipment):

- 30-day, 180-day, and 1-year proficiency sampling completed on September 11, 2013, February 7, 2014, and December 5, 2014 respectively.
- One-year confirmatory sampling completed on February 20, 2015.
- Additional confirmatory sampling completed on July 16, 2015.
- SSDS modifications for Globe Equipment were completed on Saturday February 13, 2016.
- Annual proficiency sampling was completed on February 11, 2016.
- The building is in compliance; IA and SS concentrations are less than ODH screening levels.
 - The sub-slab sample result for SS-24-B was greater than the ODH screening level (AF=10) but less than the secondary screening level (AF=33).